

must ensure that all training programs (local and federal) address the needs of the private sector. The goal will be to develop model employer-driven youth development programs.

In addition, DOES will work with the D. C. Chamber of Commerce (DCCC) to enhance its private sector summer jobs' initiative. DCCC will bring together private employers in the development of a workforce preparation program for 300 youth. This initiative is an initial step toward creating a more demand-driven youth workforce system, and increasing overall private involvement.

As a part of a grant provided by the U.S. Department of Justice, DOES and the city's Office of Youth Rehabilitation Services are working on an MOU that will transfer \$200,000 to DOES. The funding will be used to expand the WIA service delivery that is occurring year-round for youth in the TANF, homeless and foster care systems.

The immediate goal is to create a "wrap-around" service delivery system to maximize resources.

***I. Describe the State's strategies to identify State laws, regulations, policies that impede successful achievement of workforce development goals and strategies to change or modify them. (§112(b)(2).)***

The Mayor's Business Roundtable, which is comprised of senior business executives will review and assess initiatives which are submitted for incubation. If issues compromise District laws, policies, or regulations, justifications for modification will be entertained by the Mayor and the District's City Council.

***J. Describe how the State will take advantage of the flexibility provisions in WIA for waivers and the option to obtain approval as a workflex State pursuant to § 189(i) and §192.***

If the District's strategic objectives are hampered, we will pursue waiver options. Waivers will be presented to the DCWIC for review and comment. Once approved, the waiver will be posted for public comment for thirty days. All comments will be reviewed, modified as needed, and presented for final approval. At this juncture, the District is submitting the following waivers request with this plan:

- Transfer up to 100% of a program year allocation for Adult funds and up to 100% of a program year allocation for Dislocated Worker funds between the two funding streams;
- One-Stop Centers be permitted to utilize DVOP Specialists and LVER staff as fully-integrated employees in the service delivery system thereby permitting them to provide services to all customers;

- Waive the current federal percentage expenditure mandate for out-of-school youth; and
- Extend the period of time for certifying and recertifying training providers.

***VI. Describe major State policies and requirements that have been established to direct and support the development of a Statewide workforce investment system not described elsewhere in this Plan as outlined below. (§112(b)(2).)***

***A. What State policies and systems are in place to support common data collection and reporting processes, information management, integrated service delivery, and performance management? (§§111(d)(2) and 112(b)(8)(B).)***

In the District's initial WIA Plan, DOES outlined its goal to create a true "no wrong door" system for USDOL programs. That goal has been achieved. The District's workforce development system—*DCNetworks* is at the forefront of integrated workforce service delivery: Unemployment Compensation (UI), Wagner-Peyser, WIA, and Welfare-to-Work services can be accessed through one system. *DCNetworks'* information system, Virtual One Stop (DCVOS) provide the central repository for all data collection, case management, integrated service delivery, performance management, consumer reporting, information management and reporting. DCVOS is a web-based system used by all District One-Stop Career Centers and satellites, management, and staff. The system provides access to a comprehensive array of services for employers, job seekers, training providers, claimants, and youth.

Real-time performance assessments and on-line reports have been developed to monitor staff performance. The database is updated daily so that managers and staff can produce customized and ad hoc reports to meet federal or local requirements. DOES uses the system's capabilities to develop a comprehensive reporting framework for all programs. WRIS and FEDES data are also filtered through DCVOS to ensure the accuracy of employment data.

In 2004, DOES completed the development of a DCVOS/DOCS interface. DOCS is the District's mainframe unemployment compensation system. The interface provided UI claimants with the option of filing claims over the Internet. Moreover, UI claimants are automatically registered in DCVOS are encouraged to perform job searches. The system also maintains 1099 information and hearing schedules on-line.

Important UI activities, such as First Pays, Issues Placed/Resolved, ERP Interviews and Claim Exhaustion are to be imported in the near future so that the customer's service history will be included in DCVOS. This will enable

**The District of Columbia  
Waiver Request  
Workforce Investment Act  
Transfer Authority**

The District of Columbia Department of Employment Services (DOES), which is designated by the Mayor of the District of Columbia as the administrative entity for the Workforce Investment Act (WIA) and the District of Columbia Workforce Investment Council (DCWIC), are requesting a general waiver of the legal requirement that limits the transfer of funds between the Adult and Dislocated Worker programs to no more than 20% of a program year allocation. The waiver would grant the transfer of funds up to 100% of a program year allocation between the Adult and Dislocated Worker funding streams. The granting of this waiver would ensure that the critical workforce needs of District residents are met so that they are better prepared to apply the occupational skills required by the local labor market.

This waiver request follows guidelines identified in WIA Section 189(i)(4)(B) (29 USCA Section 2939(i)(4)(B)) and WIA Final Regulations at 20 CFR Section 661.420(c).

**1. Statutory Regulations to be Waived:**

WIA Section 113(b)(4)(29 USCA Section 2939(i)(4)(B)) and WIA Final Regulations at 20 CFR Section 667.140 provide that with the approval of the Governor, Local Workforce Investment Boards may transfer up to 20% of a program year allocation for adult employment and training activities, and up to 20% of a program year allocation for dislocated worker employment and training activities between the two programs.

As a single service entity, the District of Columbia's structure for WIA consists of the Department of Employment Services (DOES), which is responsible for providing the administrative and fiscal management systems for program implementation, and the District of Columbia's Workforce Investment Council (DCWIC), which perform policy functions and represents the Mayor's economic development priorities. The planning and delivery of services are administered by the DOES Associate Director of One-Stop Career Center Operations.

Washington, D.C. is predominantly an office economy and has a minimum amount of dislocated worker events. Although the mixture of Services and Government, its two leading industry divisions, provides high level and entry-level positions available to these industries, the need for literacy is essential in most related occupations. A significant percentage of the District's population is a diversified workforce lacking the customized skills and literacy levels required of the current demand economy. Strategic application of funding to enhance the effectiveness of both entry level training and re-training will be crucial to craft a customized workforce better prepared to meet employer needs.

**2. State or Local Statutory Regulatory Barriers:**

There are no state statutory or regulatory barriers to impede the proposed waiver. DOES policies and the DCWIC are in compliance with the current Federal guidelines. Upon notification of approval if this waiver request, DOES policy will be amended to comply with the terms of the waiver.

**3. Goals to be Achieved by the Waiver:**

- Allow for increased responsiveness to changes in the labor market
- Provide a more rapid and robust return into the local labor force
- Apply funds more strategically where they are most needed
- Increase accountability of One Stop Career Center service providers
- Increase employer WIC collaboration to address industry needs and worker training
- Provide greater flexibility in designing and implementing WIA programs

**4. Programmatic Outcomes to be Achieved by the Waiver:**

DOES has exercised the options under WIA to transfer up to 20% of funds. However, by virtue of the District's critical disconnect between employer skill requirements and workforce skills capabilities, increased funding flexibility and control to transfer funds between the Adult and Dislocated Worker programs will allow for further customized service delivery and maximized use of limited funds.

The role of DCWIC is to plan, oversee and evaluate the delivery of workforce training. DOES will partner with the DCWIC to facilitate the design of innovative programs unique to the District's needs and priorities. Such customized programs will result in increased service provider accountability and service impact. The granting of the waiver will allow the District to continue to meet its goal of tailoring a competency based and dynamic workforce that is prepared to competitively meet the needs of the new economy.

**5. State Local Statutory or Regulatory Barriers:**

There are no existing state or local statutory or regulatory barriers to implementation of this waiver request.

**6. Individuals Impacted by the Waiver:**

This waiver will benefit employers, job seekers, service providers, DCWIC, and DOES. The following are expected to be additional impacts of the proposed waiver:

- Program participants will benefit from the resulting flexibility that will allow for more innovation in program design better aligned to the District's needs and priorities
- More workforce customers will have access to core, intensive and training services
- WIA Administrator will have added flexibility to move funds where they are needed

**7. Process Used to Monitor Progress in Implementing the Waiver:**

DOES has in place a monitoring and performance accountability system that measures and evaluates result for employers and jobseekers accessing the District's network of One-Stop Career centers. On a monthly and quarterly basis, DOES analyzes client enrollment and service levels, program expenditures, and performance outcomes. In addition, program monitors conduct onsite quarterly technical assistance reviews designed to assure that contract requirements are being met for all WIA programs. On an annual basis, comprehensive monitoring is conducted onsite utilizing outcome reports generated from DOES's District wide database. Should this waiver request be granted, DOES will ensure regular review of the Adult and Dislocated Worker programs to monitor outcomes and service impact resulting from the additional fund transfer authority.

**8. Process for Notice of Local Boards and Opportunity to Comment:**  
DOES sought the input of DCWIC during the development of the waiver request. Over a period of several months, DOES administrators met to review their expenditure levels and program needs and ultimately received unanimous support for the submission of this waiver. Once the waiver document is finalized, it will be published for 30 days on the public web site maintained by DOES to allow for public comment on its content and potential impact. In addition a copy of the waiver will be available for public inspection at DOES offices, and electronic copies of the waiver will be sent via e-mail to workforce centers.